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*WowWee Group Limited,*  
*WowWee Canada, Inc., and*  
*WowWee USA, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WOWWEE GROUP LIMITED, WOWWEE  
CANADA, INC., and WOWWEE USA,  
INC.,  
*Plaintiffs*

v.

AAIWA ELECTRONIC TECHNOLOGY  
CO., LTD., ABCDEFGH STORE,  
ACESPOWER, ALLWESOME STORE,  
ANTHNOY'S INTERNATIONAL TRADE,  
A.K.A. ANTONY INTERNATIONAL  
TRADE, BABY LOVINY STORE, BAY  
KITCHENWARES STORE, BEIJING  
FULIO TECH AND TRADING CO., LTD.  
A/K/A FULIO, BOOKFONG DOUDOU  
STORE, BUSTRIEND STORE, HCY  
SCIENCE AND TECHNOLOGY LTD.  
A/K/A HCY BONG HIGH CLUB, CIXI  
CITY MAYEE ELECTRIC APPLIANCE  
CO., LTD., DAVIDHE STORE,  
DONGGUAN EREALER ELECTRONIC  
TECHNOLOGY CO., LTD. A/K/A  
EREALER INDUSTRIAL (HONGKONG)  
CO., LIMITED, DONGGUAN INGLEBY  
MECHANICAL EQUIPMENT CO., LTD ,

**CIVIL ACTION No.**  
**17-cv-7969 (RWS)**

DONGGUAN MUSHANG  
 SILICONE&PLASTIC PRODUCTS CO.,  
 LTD., DONGGUAN SEORY DECO CO.,  
 LTD. , DONGGUAN YUYANG MUSICAL  
 INSTRUMENT CO., LTD. A/K/A MAGNA  
 UKELELE GUITAR, E\_SHOP2008 A/K/A  
 SHEN ZHEN, EBUY360 OUTLET STORE,  
 ECIGMOD, EDC HAND SPIN STORE,  
 EIFFELBRIDE, FIDGET SPINNERS  
 STORE, FINGER\_MONKEY\_DHGate,  
 FUZHOU JOINTOP IMP. & EXP. CO., LTD.  
 A/K/A JOINTOP, GUANGZHOU HANG  
 SHENG TECHNOLOGY CO., LTD. ,  
 GUNTOY STORE, HEFEI SUNHOPE  
 TRADE CO., LIMITED, HONG JING  
 BUSINESS, HT BOUTIQUE TOY STORE,  
 JINJIANG HUIHAO HARDWARE CO.,  
 LTD. A/K/A JINJIANG HUIHAO  
 HARDWARE PLASTIC HANDICRAFT  
 CO., LTD., JOA STORE, KID&LOVE  
 STORE A/K/A KIDS & LOVE ,  
 KUAILEMENG'S TOY WORLD STORE,  
 KYSHADOW A/K/A CRYSTAL  
 KYSHADOW, LEADINGSTAR RC TOY  
 STORE, LM TOY STORE,  
 MAGIC\_PARADISE, MY TOY WORLD,  
 NANJING BABYTOP INTERNATIONAL  
 TRADING CO., LTD., NINGBO TOPTEN  
 INDUSTRY CO., LTD., ONLINE STORE  
 236134, OUTDOORCLUBS, PETREL GOO,  
 PLEASURE SHOPPING BLOCKS TOY  
 STORE, QINGDAO CLUNT BEARING  
 CO., LTD., SAMANTHALEE STORE,  
 SESAME TOY STORE, SHAANXI  
 KEYSUN BIO-TECH CO., LTD. A/K/A KAI  
 CHENG INDUSTRIAL CO., LIMITED,  
 SHANGHAI RONDY TOYS CO., LTD.,  
 SHANGHAI2010, SHANTOU CHENGHAI  
 GUANGYI MEIJIN PLASTIC TOYS  
 FACTORY, SHENZHEN AIDAR TRADING  
 CO., LTD., SHENZHEN ANTHOME  
 TECHNOLOGY CO., LTD., SHENZHEN  
 ARES TECHNOLOGY LIMITED,  
 SHENZHEN ASPERO TECHNOLOGY CO.,  
 LTD., SHENZHEN ATOY TECHNOLOGY  
 CO., LTD., SHENZHEN BAIYI  
 TECHNOLOGY CO., LTD., SHENZHEN

BAOLIFENG OPTO-ELEC CO., LTD.,  
 SHENZHEN BETTER NEW GIFT DESIGN  
 DEPT. A/K/A SZ BETTER LIMITED,  
 SHENZHEN BO XIN RONG  
 TECHNOLOGY CO., LTD., SHENZHEN  
 BOLT INNOVATION TECHNOLOGY CO.,  
 LTD., SHENZHEN CHUNBELL  
 ELECTRONIC CO., LTD., SHENZHEN  
 CITY SYART TRADE COMPANY LTD.,  
 SHENZHEN CO-FRIENDSHIP TRADING  
 CO., LTD., SHENZHEN DST TECH CO.,  
 LTD., SHENZHEN EASYSMOKS  
 TECHNOLOGY CO., LTD., SHENZHEN  
 EUNION TECHNOLOGY CO., LTD.,  
 SHENZHEN FAVORITE TECHNOLOGY  
 CO., LTD., SHENZHEN FIRE-WOLF  
 ELECTRONICS CO., LTD., SHENZHEN  
 FIVE STAR TRADING CO., LTD.,  
 SHENZHEN GARUDA TECHNOLOGY  
 LIMITED A/K/A GARUDA GROUP ,  
 SHENZHEN GDC TILLWELL  
 TECHNOLOGY LTD., SHENZHEN GOLD  
 COST TECHNOLOGY CO., LTD.,  
 SHENZHEN GOOKY TECHNOLOGY CO.,  
 LTD., SHENZHEN GOWELL  
 TECHNOLOGY CO., LTD. (G-WIRELESS),  
 SHENZHEN HANBETER TECHNOLOGY  
 CO., LTD. , SHENZHEN HENGFULONG  
 TECHNOLOGY CO., LTD., SHENZHEN HI  
 FORTUNE TECHNOLOGY CO., LTD.,  
 SHENZHEN HIPER SONG ELECTRONIC  
 TECHNOLOGY CO., LTD., SHENZHEN  
 HLS ELECTRONIC TECHNOLOGY  
 LIMITED, SHENZHEN HONGTAIDINGYE  
 ELECTRONICS CO., LTD. , SHENZHEN  
 ISM TECHNOLOGY CO., LTD.,  
 SHENZHEN IWELLGLOBAL  
 TECHNOLOGY CO., LTD., SHENZHEN  
 JIEDAKE TECHNOLOGY CO., LTD.,  
 SHENZHEN JIJIALASI INDUSTRIAL CO.,  
 LTD., SHENZHEN JINGXIN  
 SCIENCE&TECHNOLOGY  
 DEVELOPMENT CO., LTD., SHENZHEN  
 JINPIN BALANCE TECHNOLOGY CO.,  
 LTD, SHENZHEN JOYSTAR  
 ELECTRONICS CO., LTD., SHENZHEN  
 JUTUO SUPPLY CHAIN CO., LTD.,

SHENZHEN JXK TECHNOLOGY CO.,  
 LTD, SHENZHEN KAREN M  
 ELECTRONICS CO., LTD., SHENZHEN  
 KARISIN IMPORT&EXPORT CO., LTD.,  
 SHENZHEN KINGSWAY TECHNOLOGY  
 CO., LTD. , SHENZHEN KISN  
 TECHNOLOGY CO., LIMITED.,  
 SHENZHEN LANYOS INTELLIGENT  
 TECHNOLOGY CO.,LTD, SHENZHEN  
 LCOSE ELECTRONIC TECHNOLOGY  
 CO., LTD., SHENZHEN LEADINGPLUS  
 ELECTRONIC CO., LTD., SHENZHEN  
 LEYI INDUSTRIAL CO., LTD.,  
 SHENZHEN LIPENGDA CULTURAL GIFT  
 CO., LTD., SHENZHEN LISTING  
 TECHNOLOGY CO., LTD., SHENZHEN  
 LONG SHENG CENTURY TECHNOLOGY  
 CO., LTD., SHENZHEN MYTASTE RJX  
 HARDWARE CO., LTD, SHENZHEN  
 NAVATA TECHNOLOGY CO., LTD.,  
 SHENZHEN NEW IMAGE TECHNOLOGY  
 CO., LTD , SHENZHEN OREBO  
 TECHNOLOGIES LTD., SHENZHEN  
 ORHONG ELECTRONIC TECHNOLOGY  
 CO., LTD., SHENZHEN QIO  
 TECHNOLOGY CO., LTD., SHENZHEN  
 QUEST TECHNOLOGY CO., LTD.,  
 SHENZHEN SHENYUAN TECH CO.,  
 LTD., SHENZHEN SKYVIEW  
 TECHNOLOGY LIMITED, SHENZHEN  
 SMOFIT TECHNOLOGY CO., LTD.,  
 SHENZHEN SPDAK TECHNOLOGY  
 COMPANY LIMITED, SHENZHEN SPRI  
 TECHNOLOGY CO., LTD., SHENZHEN  
 SUNFIRE TECHNOLOGY CO., LTD.,  
 SHENZHEN TECHNOLI TECHNOLOGY  
 CO., LTD., SHENZHEN USMART  
 ELECTRONICS TECHNOLOGY CO., LTD.  
 , SHENZHEN VCEEGO TECHNOLOGY  
 CO., LTD., SHENZHEN VFOCUS  
 ELECTRONIC TECHNOLOGY R&D CO.,  
 LTD., SHENZHEN V-VISION  
 TECHNOLOGY CO., LTD., SHENZHEN  
 WELLCORE TECHNOLOGY CO., LTD.,  
 SHENZHEN WOW GIFT CO., LTD.,  
 SHENZHEN XINGAOSHENG  
 TECHNOLOGY CO., LTD., SHENZHEN

XINHAOYUAN TECHNOLOGY CO., LTD.  
 SHENZHEN XZD TECHNOLOGY CO.,  
 LTD., SHENZHEN YUWAY  
 TECHNOLOGY CO., LTD. , SHENZHEN Z-  
 COOL TIMES TECHNOLOGY CO., LTD.,  
 SHENZHEN ZMART TECHNOLOGY CO.,  
 LTD., SHENZHEN ZOOMING  
 ELECTRONIC CO., LTD., AIPIN STORE,  
 SHOP2949193 STORE, SHOP319037  
 STORE, STEPHAN STORE STORE, HONG  
 KONG SUPERFAST TECHNOLOGY CO.  
 LTD. A/K/A SUPERFAST,  
 SUPERGLOBAL, SUZHOU LN PROMO  
 CO., LTD., SUZHOU SWEETDRESSES  
 WEDDINGDRESS CO. LTD. A/K/A  
 SWEETDRESSES, SHENZHEN CITY  
 POLY HUI FOREIGN TRADE CO., LTD.  
 A/K/A SZ\_ST\_LUO, SZALONE1, TEEM  
 TECHNOLOGY CO., LTD. A/K/A  
 SQUISHIES THEA STORE, TUKIIE  
 STORE, TUMI OFFICIAL STORE,  
 TUMIPETLIFE STORE, XIAMEN  
 JIAYIKANG ENVIRONMENTAL  
 TECHNOLOGY CO., LTD., XIAMEN  
 WINDSAIL, OUTDOOR GEAR &  
 SPORTING GOODS CO., LTD.,  
 SHENZHEN BITIAN TECHNOLOGY  
 LTD., XQBOSS STORE, YIWU BRIOSTA  
 APPARELS FACTORY, YIWU CONA  
 SPORTS CO., LTD., YIWU ECO BAOYU  
 E-BUSINESS FIRM, YIWU GREEN SHINE  
 ARTS & CRAFTS CO., LTD. , YIWU  
 GREEN SHINE GIFTS AND TOYS CO.,  
 LTD., YIWU HUI ZHE TRADING CO.,  
 LTD., YIWU KUOTAI TRADING CO.,  
 LTD., YIWU RUIMIAN E-COMMERCE  
 TRADING FIRM, AND ZHIMEI ONLINE  
 A/K/A ZHIYUANWEDDING,

*Defendants*

**CERTIFICATE OF SERVICE**

I, Mary Kate Brennan, hereby certify as follows:

1. I am over eighteen (18) years of age and not a party to this action. I have never been convicted of a felony or any criminal offense involving moral turpitude, and I am fully competent to attest to the matters stated herein. I have personal knowledge of every statement made in this Certificate of Service and such statements are true and correct.
2. I am an associate attorney with the law firm Epstein Drangel LLP, a limited liability partnership located at 60 East 42<sup>nd</sup> Street, Suite 2520, New York, New York 10165. I am duly admitted to practice before the Courts of the State of New York and the United States District Court for the Southern District of New York.
3. I am an attorney for WowWee Group Limited, WowWee Canada, Inc. and Plaintiff WowWee USA, Inc. (“WowWee” or “Plaintiffs”), in the above-captioned case.
4. On October 17, 2017, Plaintiffs filed this action and moved *ex parte* against Defendants Aaiwa Electronic Technology Co.,Ltd, AbcdeFgH Store, Acespower, Allwesome Store, Anthnoy's International Trade, a.k.a. Antony International Trade, baby lovinY Store, Bay Kitchenwares Store, Beijing Fulio Tech And Trading Co., Ltd. a/k/a Fulio, BOOKFONG DOUDOU Store, Bustriend Store, HCY Science and Technology Ltd. a/k/a HCY bong High Club, Cixi City Mayee Electric Appliance Co., Ltd., Davidhe Store, Dongguan Erealer Electronic Technology Co., Ltd. a/k/a Erealer Industrial (Hongkong) Co., Limited, Dongguan Ingleby Mechanical Equipment Co., Ltd , Dongguan MuShang Silicone&Plastic Products Co., Ltd., Dongguan Seory Deco Co., Ltd. , Dongguan Yuyang Musical Instrument Co., Ltd. a/k/a Magna Ukelele Guitar, E\_shop2008 a/k/a shen zhen, Ebuy360 Outlet Store, ecigmod, EDC Hand Spin Store, Eiffelbride, Fidget Spinners Store, Finger\_monkey\_dhgate, Fuzhou Jointop Imp.

& Exp. Co., Ltd. a/k/a Jointop, Guangzhou Hang Sheng Technology Co., Ltd. , Guntoy Store, Hefei Sunhope Trade Co., Limited, Hong Jing Business, HT Boutique Toy Store, Jinjiang Huihao Hardware Co., Ltd. a/k/a Jinjiang Huihao Hardware Plastic Handicraft Co., Ltd., Joa Store, kid&Love Store a/k/a Kids & Love , KUAILEMENG'S TOY WORLD Store, kyshadow a/k/a Crystal Kyshadow, LeadingStar RC Toy Store, LM TOY Store, Magic\_paradise, My toy world, Nanjing Babytop International Trading Co., Ltd., Ningbo Topten Industry Co., Ltd., Online Store 236134, outdoorclubs, Petrel Goo, pleasure shopping blocks toy Store, Qingdao Clunt Bearing Co., Ltd., SamanthaLee Store, Sesame TOY Store, Shaanxi Keysun Bio-Tech Co., Ltd. a/k/a Kai Cheng Industrial Co., Limited, Shanghai Rondy Toys Co., Ltd., shanghai2010, Shantou Chenghai Guangyi Meijin Plastic Toys Factory, Shenzhen Aidar Trading Co., Ltd., Shenzhen Anthome Technology Co., Ltd., Shenzhen Ares Technology Limited, Shenzhen Aspero Technology Co., Ltd., Shenzhen ATOY Technology Co., Ltd., Shenzhen BAIYI Technology Co., Ltd., Shenzhen Baolifeng Opto-Elec Co., Ltd., Shenzhen Better New Gift Design Dept. a/k/a SZ Better Limited, Shenzhen Bo Xin Rong Technology Co., Ltd., Shenzhen Bolt Innovation Technology Co., Ltd., Shenzhen Chunbell Electronic Co., Ltd., Shenzhen City Syart Trade Company Ltd., Shenzhen Co-Friendship Trading Co., Ltd., Shenzhen Dst Tech Co., Ltd., Shenzhen Easysmoks Technology Co., Ltd., Shenzhen Eunion Technology Co., Ltd., Shenzhen Favorite Technology Co., Ltd., Shenzhen Fire-Wolf Electronics Co., Ltd., Shenzhen Five Star Trading Co., Ltd., Shenzhen Garuda Technology Limited a/k/a Garuda Group , Shenzhen GDC Tillwell Technology Ltd., Shenzhen Gold Cost Technology Co., Ltd., Shenzhen Gooky Technology Co., Ltd., Shenzhen Gowell Technology Co., Ltd. (G-Wireless), Shenzhen Hanbeter Technology Co., Ltd. ,

Shenzhen Hengfulong Technology Co., Ltd., Shenzhen Hi Fortune Technology Co., Ltd., Shenzhen Hiper Song Electronic Technology Co., Ltd., Shenzhen HLS Electronic Technology Limited, Shenzhen Hongtaidingye Electronics Co., Ltd. , Shenzhen ISM Technology Co., Ltd., Shenzhen Iwellglobal Technology Co., Ltd., Shenzhen Jiedake Technology Co., Ltd., Shenzhen Jijialasi Industrial Co., Ltd., Shenzhen Jingxin Science&Technology Development Co., Ltd., Shenzhen Jinpin Balance Technology Co., Ltd, Shenzhen Joystar Electronics Co., Ltd., Shenzhen Jutuo Supply Chain Co., Ltd., Shenzhen JXK Technology Co., Ltd, Shenzhen Karen M Electronics Co., Ltd., Shenzhen KaRiSin Import&Export Co., Ltd., Shenzhen Kingsway Technology Co., Ltd. , Shenzhen KISN Technology Co., Limited., Shenzhen Lanyos Intelligent Technology Co.,Ltd, Shenzhen Lcose Electronic Technology Co., Ltd., Shenzhen Leadingplus Electronic Co., Ltd., Shenzhen Leyi Industrial Co., Ltd., Shenzhen Lipengda Cultural Gift Co., Ltd., Shenzhen Listing Technology Co., Ltd., Shenzhen Long Sheng Century Technology Co., Ltd., Shenzhen Mytaste RJX Hardware Co., Ltd, Shenzhen Navata Technology Co., Ltd., Shenzhen New Image Technology Co., Ltd , Shenzhen Orebo Technologies Ltd., ShenZhen OrHong Electronic Technology Co., Ltd., Shenzhen Qio Technology Co., Ltd., Shenzhen Quest Technology Co., Ltd., Shenzhen Shenyuan Tech Co., Ltd., Shenzhen Skyview Technology Limited, Shenzhen Smofit Technology Co., Ltd., Shenzhen Spdak Technology Company Limited, Shenzhen Spri Technology Co., Ltd., Shenzhen Sunfire Technology Co., Ltd., Shenzhen Technoli Technology Co., Ltd., Shenzhen Usmart Electronics Technology Co., Ltd. , Shenzhen VCEEGO Technology Co., Ltd., Shenzhen Vfocus Electronic Technology R&d Co., Ltd., Shenzhen V-Vision Technology Co., Ltd., Shenzhen Wellcore Technology Co., Ltd., Shenzhen Wow Gift Co., Ltd., Shenzhen Xingaosheng



Technology Co., Ltd., Shenzhen Xinhaoyuan Technology Co., Ltd., Shenzhen XZD Technology Co., Ltd., Shenzhen Yuway Technology Co., Ltd. , Shenzhen Z-Cool Times Technology Co., Ltd., Shenzhen Zmart Technology Co., Ltd., Shenzhen Zooming Electronic Co., Ltd., AIPIN Store, Shop2949193 Store, Shop319037 Store, Stephan Store Store, Hong Kong Superfast Technology Co. Ltd. a/k/a Superfast, Superglobal, Suzhou Ln Promo Co., Ltd., Suzhou sweetdresses Weddingdress Co. Ltd. a/k/a sweetdresses, Shenzhen City Poly Hui Foreign Trade Co., Ltd. a/k/a Sz\_st\_luo, Szalone1, Teem Technology Co., Ltd. a/k/a Squishies Thea Store, TuKIE Store, TUMI Official Store, TUMIpetlife Store, Xiamen Jiayikang Environmental Technology Co., Ltd., Xiamen Windsail, Outdoor Gear & Sporting Goods Co., Ltd., Shenzhen Bitian Technology Ltd., XQboss Store, Yiwu Briosta Apparels Factory, Yiwu Cona Sports Co., Ltd., Yiwu Eco Baoyu E-Business Firm, Yiwu Green Shine Arts & Crafts Co., Ltd. , Yiwu Green Shine Gifts And Toys Co., Ltd., Yiwu Hui Zhe Trading Co., Ltd., Yiwu Kuotai Trading Co., Ltd., Yiwu Ruimian E-Commerce Trading Firm, and Zhimei Online a/k/a Zhiyuanwedding (collectively, “Defendants”) for an order to seal file, a temporary restraining order, an order to show cause why a preliminary injunction should not issue, an asset restraining order, an order authorizing alternative service by electronic mail and an order authorizing expedited discovery (the “Application”).

5. The Court ordered Plaintiffs’ Application on October 17, 2017 (the “10/17/17 Order”).
6. Pursuant to the 10/17/17 Order, the Court issued a summons in the name of “Aaiwa Electronic Technology Co., Ltd. and all other Defendants identified in the Complaint” that applies to all Defendants (“Summons”).
7. In the 10/17/17 Order, the Court granted Plaintiffs’ request for an order authorizing

alternative service by electronic means, specifically ordering that service shall be made on Defendants and deemed effective as to all Defendants if it is completed by the following means: (1) delivery of PDF copies or a link to a secure website where each Defendant will be able to download PDF copies of the 10/17/17 Order together with the Summons and Complaint, and all papers filed in support of Plaintiffs' Application seeking the 10/17/17 Order to Defendants' e-mail addresses, as identified in Schedule A to the 10/17/17 Order or may otherwise be determined; or (2) delivery of a message to Defendants through the same means that Plaintiffs' agents have previously communicated with Defendants, namely the system for communications established by the Third Party Service Providers on their respective platforms (*i.e.*, Alibaba.com, AliExpress.com and DHgate.com), notifying Defendants that an action has been filed against them in this Court and providing a link to a secure website where each Defendant will be able to download PDF copies of the 10/17/17 Order together with the Summons and Complaint, and all papers filed in support of Plaintiffs' Application seeking the 10/17/17 Order.

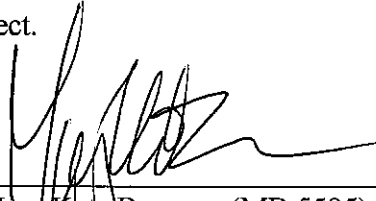
8. On October 26, 2017, pursuant to the 10/17/17 Order, we sent copies of the 10/17/17 Order together with the Summons and the Complaint and all papers filed in support of Plaintiffs' Application seeking the 10/17/17 Order by email using RPost's registered email system to each and every Defendant.
9. Also on October 26, 2017, pursuant to the 10/17/17 Order, we sent copies of the 10/17/17 Order together with the Summons and the Complaint and all papers filed in support of Plaintiffs' Application seeking the 10/17/17 Order by messaging through the system for communications established by the Third Party Service Providers on their respective platforms (*i.e.*, Alibaba.com, AliExpress.com and DHgate.com) to all

Defendants, except the following Defendants: Gunttoy Store, Shenzhen Ares Technology Limited, Shenzhen Smofit Technology Co., Ltd., Shenzhen City Poly Hui Foreign Trade Co., Ltd. a/k/a Sz\_st\_luo, Shenzhen Zooming Electronic Co., Ltd. and Xiamen Jiayikang Environmental Technology Co., Ltd. (*see supra* ¶ 8).

I declare under the penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct.

Dated: October 26, 2017  
New York, New York

By:



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*WowWee USA, Inc.*